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The Honorable Christopher Alston
Chapter 13 Proceeding
Location: Seattle
Hearing Date: August 24, 2023
Hearing Time: 9:30 a.m.
Response Date: August 17, 2023

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

In re: : Case No.: 19-14656
TIMOTHY MCLAUGHLIN, :
Debtor(s). : MOTION FOR ORDER ALLOWING
WITHDRAW OF ATTORNEY'S FOR
DEBTOR

NOTICE

TO: The Clerk of the Above-Entitled Court

AND TO: All creditors and the Chapter 13 Trustee

YOU ARE HEREBY NOTIFIED that a hearing on the debtor's Motion for Order
Allowing Withdraw of Attorney's for Debtor will be heard before The Honorable Christopher
Alston on August 24, 2023 at 9:30a. at the United States Courthouse, 700 Stewart Street, Room
6301, Courtroom 7206, Seattle, WA 98101.

If you choose to respond to this motion, you must do so by August 17, 2023 by filing a
response with the Court and serving a copy of your response on debtor's counsel. If you fail to
do so, the Court may enter an order granting the motion without any hearing and without any
further notice to you.

Motion to Withdraw as Counsel

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1 **MOTION**

2 COMES NOW Thomas D. Neeleman and the Neeleman Law Group, P.C. the attorneys
3 of record for the debtor, and move this court for an order allowing the withdrawal as attorneys of
4 record. This motion is based on the following and the attached declaration of Thomas D.
5 Neeleman:

- 6 1. This case was filed on December 24, 2019.
7 2. This case was confirmed on March 6, 2020.
8 3. At the present time, meaningful communication between myself, my office and the
9 debtor has ceased rendering effective representation impossible. In addition, the
10 debtor has sent correspondence to counsel asking for counsel to withdraw.
11 4. The debtor's last known address is 25235 SE Kalahanie Blvd, Unit D203, Issaquah,
12 WA 98029, phone is 240-475-8964 and email is damien144@hotmail.com.
13 5. There are no deadlines, hearings or trials that will be automatically continued as a
14 result of the attorney's withdrawal.

15 WHEREFORE, Thomas D. Neeleman and the Neeleman Law Group, P.C. the attorneys
16 of record for the debtor request that the Court enter an order allowing the withdrawal of Thomas
17 D. Neeleman and the Neeleman law Group, P.C. as attorneys of record for the above-named
18 debtor.

19 A copy of the proposed order is attached to this motion.

20 Dated this 31st day of July, 2023

21 /s/ Thomas D. Neeleman
22 Thomas D. Neeleman
23 Attorney for Debtor(s)